

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WEST DIV CINCINNATI

BARBARA LODER HILDEBRANDT,

Plaintiff

VS.

HYATT CORPORATION, *et al.*,

Defendants

CASE NO. C-1-02-0003

Judge Beckwith
Magistrate Judge Sherman

PLAINTIFF'S WITNESS LIST AND TESTIMONY SUMMARY

Plaintiff, BARBARA LODER HILDEBRANDT ("Plaintiff"), by and through counsel, in accordance with the Court's Order, hereby submits to Defendants HYATT CORPORATION, TY HELMS and BRIAN J. BOOTH ("Defendants"), the following Witness List:

1. Barbara Loder Hildebrandt: Her employment with Hyatt, practices in the National Sales Force, and sales duties and responsibilities, and damages.
2. Lee Hildebrandt: His knowledge regarding the claims of the Plaintiff, and damages.
3. Ty Helms: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

4. Jack Horne: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

5. Brian Booth: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

6. Doug Patrick: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, and Hyatt policies.

7. Cathy Petz: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, and Hyatt policies.

8. Rob Schnitz: His knowledge regarding his employment with Hyatt, and the claims of the Plaintiff.

9. Scott Miller: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and Hyatt policies.

10. Ed Rabin: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and Hyatt policies.

11. Bruce Small: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, and practices in the National Sales Force.

12. Jeanne Pearson: Hyatt's computer database.

13. Rob Sarmiento: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

14. Loretta Venezia: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

15. Christie Hicks: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

16. Molly Crompton: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

17. Barbara Hale: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

18. Jennifer Roman: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

19. Wendy Jensen: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

20. Mary Rocereto: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

21. Mary Patton: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

22. Jane Johnson: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

23. Dean D'Anna: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

24. Dawn Beagle: Her employment with Hyatt, her knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

25. Brian Cassidy: His employment with Hyatt, his knowledge regarding the claims of the Plaintiff, practices in the National Sales Force, and sales duties and responsibilities.

26. All individuals identified in response to Plaintiff's discovery requests, including individuals listed on documents provided to Plaintiff.

27. All individuals listed on Defendant's witness list.

28. Any and all witnesses who become evident during the discovery process.

29. Any expert witness retained by Plaintiff or Defendants.


30. Representatives of each of the accounts listed in Answer 3, page 5 of Defendants' First Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories To All Defendants, served on November 22, 2002. These witnesses will

testify whether their companies were treated as National Accounts by Defendants during 2001 and 2002.

31. Representatives of each of the accounts listed in the document Bates numbered 32350, entitled "Barb Loder Account," served on December 9, 2002. These witnesses will testify whether their companies were treated as National Accounts by Defendants during 2001 and 2002.

DATED this 5th day of December, 2002.

Respectfully submitted,

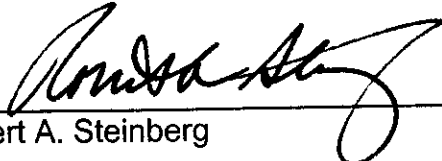
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Plaintiff's Witness List and Testimony Summary was served via facsimile and regular mail to Theresa M. Gallion, Esq. and Natalie J. Storch, Esq. this 24th day of November 2003.



Robert A. Steinberg